

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ADAM BROWN, on Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

v.

LEARFIELD COMMUNICATIONS, LLC,  
SIDEARM SPORTS, LLC, THE  
UNIVERSITY OF TEXAS AT AUSTIN,  
and THE UNIVERSITY OF TEXAS AT  
AUSTIN ATHLETICS,

Defendants.

**Case No.: 1:23-cv-00374-DAE**

**PLAINTIFF'S UNOPPOSED JOINDER IN AND INCORPORATION BY REFERENCE  
OF THE UNITED STATES OF AMERICA'S MEMORANDUM OF LAW IN DEFENSE  
OF THE CONSTITUTIONALITY OF THE VIDEO PRIVACY PROTECTION ACT**

**(Dkt. 42-1)**

Due to the factual and legal overlap of the arguments made by the United States of America in its Memorandum of Law in Defense of the Constitutionality of the Video Privacy Protection Act (Dkt. 42-1), Plaintiff Adam Brown, on behalf of himself and all others similarly situated, hereby joins in and incorporates the arguments of the United States of America into his own opposition to Defendants' Motion to Dismiss and will not repeat those arguments in full in his opposition brief.

**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

Dated: October 4, 2023

**FOSTER YARBOROUGH PLLC**

By: /s/ Patrick Yarborough  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that on October 4, 2023, counsel for Plaintiff conferred with counsel for Defendants Learfield Communications, LLC and Sidearm Sports, LLC, who confirmed by email that such Defendants have no objection to the relief sought by the Plaintiff herein.

/s/ Patrick Yarborough  
Patrick Yarborough

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically filed on October 4, 2023 with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

*/s/ Patrick Yarborough*  
Patrick Yarborough